

1 DAVID H. KRAMER, SBN 168452  
Email: dkramer@wsgr.com  
2 MAURA L. REES, SBN 191698  
Email: mrees@wsgr.com  
3 WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation  
4 650 Page Mill Road  
Palo Alto, CA 94304-1050  
5 Telephone: (650) 493-9300

6 ERIC P. TUTTLE, SBN 248440  
Email: eric.tuttle@wsgr.com  
7 WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation  
8 701 Fifth Avenue, Suite 5100  
Seattle, WA 98104-7036  
9 Telephone: (206) 883-2500

10 *Counsel for Defendant*  
GOOGLE LLC

11  
12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14 SAN FRANCISCO DIVISION  
15

16 JILL LEOVY, NICHOLAS GUILAK, )  
CAROLINA BARCOS, PAUL MARTIN, )  
17 MARILYN COUSART, ALESSANDRO DE LA )  
TORRE, VLADISLAV VASSILEV, JANE )  
18 DASCALOS, and minor G.R., individually, and )  
on behalf of all other similarly situated, )

19 Plaintiffs, )  
20 )

21 v. )

22 GOOGLE LLC, )

23 Defendant. )  
24  
25  
26  
27  
28

CASE NO.: 3:23-cv-03440-AMO

**DECLARATION OF ERIC P.  
TUTTLE RE STIPULATION TO  
CONTINUE CASE MANAGEMENT  
CONFERENCE AND HEARING ON  
DEFENDANT GOOGLE LLC'S  
MOTION TO DISMISS**

Judge: Hon. Araceli Martínez-Olguín

1 I, Eric P. Tuttle, declare as follows:

2 1. I am an attorney and a partner at the law firm of Wilson Sonsini Goodrich &  
3 Rosati, P.C., counsel for Defendant in this matter. I submit this declaration in support of the  
4 parties' Stipulation to Continue Case Management Conference and Hearing on Defendant  
5 Google LLC's Motion to Dismiss (the "Stipulation"). I have personal knowledge of the facts set  
6 forth herein and, if called as a witness, I could and would testify competently thereto.

7 2. The Parties previously stipulated to continue the Case Management Conference  
8 and related deadlines from October 26, 2023 to November 30, 2023 (ECF No. 22), which was  
9 so-ordered by the Court (ECF No. 23).

10 3. After Plaintiffs elected to file an amended complaint in lieu of opposing  
11 Defendants' motion to dismiss the original complaint and requested until January 5, 2024 to file  
12 the amended complaint, the Parties stipulated to further continue the Case Management  
13 Conference and related deadlines to February 22, 2024 (ECF No. 26), which was so-ordered by  
14 the Court (ECF No. 27).

15 4. The Parties subsequently stipulated to further continue the Case Management  
16 Conference from February 22, 2024 to June 6, 2024, to follow the anticipated May 16 hearing on  
17 Defendant's motion to dismiss (ECF No. 31), which was so-ordered by the Court (ECF No. 32).

18 5. Defendant moved to dismiss the First Amended Complaint on February 9, 2024  
19 (ECF No. 33), Plaintiffs filed their opposition on March 15, 2024 (ECF No. 36), and Defendant  
20 filed its reply brief on April 5, 2024 (ECF No. 37). The hearing on Defendant's motion to  
21 dismiss was noticed for May 16, 2024 at 2 p.m., per the Parties' stipulation. ECF Nos. 32, 33.

22 6. On April 30, 2024, the Court continued the hearing on Defendant's motion to  
23 dismiss from May 16, 2024 to August 22, 2024 at 2 p.m. ECF No. 38.

24 7. Counsel for Google has a pre-planned vacation that conflicts with the new hearing  
25 date of August 22, 2024.

26 8. The Parties' counsel have discussed and agreed to a two-week continuance of the  
27 hearing on Defendant's motion to dismiss, from August 22, 2024 to September 5, 2024, to a date  
28 on which counsel are available.



**SIGNATURE ATTESTATION**

I, David H. Kramer, am the ECF User whose ID and password are being used to file this document. In compliance with N.D. Cal. Civil L.R. 5-1(i)(3), I hereby attest that the concurrence in the filing of this document has been obtained from the other signatory.

By: /s/ David H. Kramer

David H. Kramer